

BEFORE THE
UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Competitive Product Prices
Inbound Parcel Post (at UPU Rates)

Docket No. CP2020-61

PUBLIC REPRESENTATIVE COMMENTS ON CHANGES IN PRICES
FOR INBOUND PARCEL POST (AT UPU RATES)

(December 18, 2019)

The Public Representative hereby provides comments pursuant to Order No. 5344.¹ In that Order, the Commission established the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on a Postal Service Notice of a change in rates not of general applicability for the Inbound Parcel Post (at UPU Rates) product.²

Included as Attachment 1 to the Notice is an application for non-public treatment of materials filed under seal. The Postal Service also filed a redacted copy of the UPU International Bureau (IB) Circular that contains the new prices, a copy of the certification pursuant to 39 C.F.R. § 3015.5(c)(2), redacted Postal Service data used to justify any bonus payments, a copy of the Postal Service's submission to the UPU in support of an inflation-linked adjustment, aa redacted copy of Governors' Decision 19-1, and redacted financial workpapers. Notice at 2-3; see id. Attachments 2-6. The Postal Service also filed an unredacted copy of Governors' Decision 19-1, an unredacted copy of the new prices, and related financial information under seal. See id.

COMMENTS

Pursuant to 39 U.S.C. § 3633(a), the Postal Service's competitive prices must not result in the subsidization of competitive products by market dominant products; ensure that each

¹ Order No. 5344, Notice and Order Concerning Changes in Prices for Inbound Parcel Post (at UPU Rates), December 11, 2019.

² Notice of the United States Postal Service of Filing Changes in Rates Not of General Applicability for Inbound Parcel Post (at UPU Rates), and Application for Non-Public Treatment, December 10, 2019, at 1-2 (Notice).

competitive product will cover its attributable costs; and, ensure that all competitive products collectively contribute an appropriate share of the institutional costs of the Postal Service.

Based upon a review of the financial workpapers, the Public Representative finds that prices for the Inbound Parcel Post (at UPU Rates) product should generate sufficient revenues to cover cost and therefore meet the requirements of 39 U.S.C. § 3633(a).

CONCLUSION

The Postal Service has established that the proposed rates for Inbound Parcel Post (at UPU Rates) are in compliance with the requirements of 39 U.S.C. § 3633(a). Thus, the Public Representative recommends that the Commission approve the rates for Inbound Parcel Post (at UPU Rates).

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

Katalin Clendenin
Public Representative

901 New York Ave., NW Suite 200
Washington, D.C. 20268-0001
(202) 789-6860
e-mail: katalin.clendenin@prc.gov